

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLIOTT CITY, MD 21042

410-984-0300

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311

201-342-6665

MEMO ENDORSED

April 24, 2023

4/25/23

OK

Colleen McMahon

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

Defendant James Cahill's ("Cahill") sentencing hearing is scheduled for May 18, 2023 at 2:00 pm. Cahill does not wish to adjourn that sentencing date. However, he does respectfully request that the due date for his sentencing submission be extended from the current date of May 4, 2023 to May 8, 2023. I recently concluded a trial and my ability to attend to all of my cases has been compressed as a result. Additionally, I have lengthy sentencing memorandum due in a complex racketeering/murder case within a few days of the current due date in this case. This Sunday through next Wednesday, I will be travelling. For these reasons, the availability of the extra weekend to work on Cahill's memorandum, the drafting which is currently in process and is a considerable task, will be of great assistance to the defense's ability to prepare for sentencing. The government, by Assistant United States Attorney Frank Balsamello, consents to this application so long as the government's filing due date is also extended by four days to May 15, 2023.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Frank Balsamello (By ECF)
AUSA Jun Xiang (By ECF)
AUSA Marguerite Colson (By ECF)
SAUSA Laura de Oliveira (by ECF)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED 4/25/23